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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CHRISTINA CANTU and REBEKAH
SVINNING, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

THOMPSON MICHIE ASSOCIATES, LLC, a
foreign limited liability company; TM EQUITIES
INC., f/k/a THOMPSON MICHIE ASSOCIATES,
INC., a foreign corporation; and DOES 1 through
50, inclusive,

Defendants.

Case No.: 2:24-CV-00908-APG-DJA

**STIPULATION TO EXTEND DEADLINE
FOR THE PARTIES TO SUBMIT A
PROPOSED DISCOVERY PLAN AND
SCHEDULING ORDER**

[Second Request]

IT IS HEREBY STIPULATED by and between Plaintiffs Christina Cantu and Rebekah Svinning (“Plaintiffs”), and Defendant TM Equities Inc (“TME”), and Thompson Michie Associates, LLC (“TMA,” and together with TME, “Defendants”) (collectively “Parties”), through their respective counsel, to extend the current deadline for the Parties to file a proposed Discovery Plan and Scheduling Order (“DPSO”) one week, from June 21, 2024, to June 28, 2024. This is the Parties’ second request for an extension on the deadline to file a proposed DPSO.

1. On June 20, 2024, the Parties conducted their conference on a proposed DPSO pursuant to FRCP 26(f).

2. During the conference, the Parties discussed for the first time the prospect of tolling Plaintiffs’ claims while the Parties pursued alternative dispute resolution. After discussing names of

mediators and other particulars, the Parties agreed – in principle – to stay all case deadlines while the Parties explored possible early resolution of this dispute through mediation.

3. The Parties expected to be able to file a stipulated stay of all case deadlines today – in lieu of their proposed DPSO. Unfortunately, the Parties have been unable to agree on all the terms of a stay, or the terms of a tolling agreement pending any stay. The Parties need additional time to negotiate these terms and, if they are unable to agree, they will submit their proposed DPSO next week.

4. The Parties have therefore agreed to extend the deadline for filing their DPSO one week until June 28, 2024.

5. The Parties further agree that they are not waiving, relinquishing, or otherwise impairing any claim, defense, or other right they may have by virtue of entering this Stipulation.

6. This request is made in good faith and not for the purpose of delay.

Dated this 21st day of June, 2024.

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Attorneys for Defendant TM Equities, Inc.

ORDER

IT IS SO ORDERED.

Dated: 6/25/2024


UNITED STATES MAGISTRATE JUDGE



CERTIFICATE OF SERVICE

I hereby certify that, on the date shown file stamped on this pleading, I served a copy of the foregoing pleading via electronic service in accordance with the Court's order and Local Rules and that it was served on all parties registered with the Court's CM/ECF system of electronic service.


JASON KULLER